

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ACADEMY OF RELIGION; AMERICAN
ASSOCIATION OF UNIVERSITY PROFESSORS;
PEN AMERICAN CENTER; TARIQ RAMADAN,

Plaintiffs,

v.

MICHAEL CHERTOFF, in his official capacity as
Secretary of the Department of Homeland Security;
CONDOLEEZZA RICE, in her official capacity as
Secretary of State,

Defendants.

**PLAINTIFFS' MOTION
FOR PRELIMINARY
INJUNCTION**

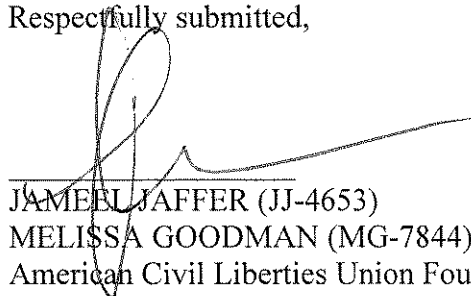
Case No. 06-588 (PAC)

MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), plaintiffs move this Court for a preliminary injunction (i) enjoining defendants from denying a visa to Professor Tariq Ramadan on the basis of 8 U.S.C. § 1182(a)(3)(B)(i)(VII); (ii) enjoining defendants from denying a visa to Professor Ramadan on the basis of speech that United States residents have a constitutional right to hear; (iii) requiring defendants immediately to adjudicate Professor Ramadan's pending visa application; and (iv) requiring defendants immediately to restore Professor Ramadan's eligibility to rely on the visa waiver program described in 8 U.S.C. § 1187(a).

The reasons for this motion are set forth in the accompanying memorandum. Plaintiffs have informed defendants of their intent to file this motion, and defendants have indicated their intent to oppose it.

Respectfully submitted,



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